Osberg v. Foot Locker, Inc., et al., 07-cv-01358 (KBF) (S.D.N.Y.)

## Class's Opposition to Defendants' Motion in Limine to Exclude Testimony of Christopher Maikels

July 10, 2015

## **EXHIBIT A**

## WOOLWORTH CORPORATION

INTEGRATION LEVEL:		\$22,000		\$22,000		\$22,000		\$22,000		Current Rung	
PAY CREDITS:	<u>SERVICE</u> 0 - 10 11 - 20 21+		1.75% /0.75%       1.95%         2.25 /1.00       2.50         3.00 /1.25       3.35		2.50	/0.85% /1.10 /1.40	2.75 /1.25		1.80% /0.85% 2.50 /1.10 3.50 /1.40		Plan
NORMAL COSTS: Ongoing:		\$7,364,000		\$8,218,000		\$8,855,000		\$7,980,000		\$ 9,798,000	
First Year.		2,544,000		2,984,000		3,278,000		2,814,000		9,798,006	
AGE SERVICE  35 5 30 0 35 5 37 35 5 35 25 50 20 45 20 50 20	CURRENT  PAY  20,000 \$-16,000  50,000  -150,000  150,000  50,000  -150,000  -150,000	AGE 65 <u>PAY</u> 64,868 \$\frac{63,000}{162,170} 72,000 486,510 222,000 36,019 -329,000 90,047 -400,000 2.70,142	AGE 65 ANNUITY 69724 \$7,243 19,880 8,126 62,939 42,404 42,07 42,301 12,893 41,964 4/1,957	FINAL PAY  MULTIPLE  1.0  1.1  1.2  1.8  1.1  1.2  1.8  1.1  1.2  1.4	AGE 65 ANNUITY 7.740 \$ 8,079 22,064 -8,984 69,855 -43,572 4,428 45,893 13,558 46,382 44,101	FINAL PAY  MULTIPLE  1.1  1.3  1.8  1.1  1.3  1.4  1.7	AGE 65 <u>ANNUITY</u> <b>8,597 \$ 8,928 24,700</b> <del>10,037</del> <b>78,428</b> <u>45,285</u> <b>4,697</b> <del>51,138</del> <b>14,482</b> <del>-51,612</del> <b>47,217</b>	FINAL PAY  MULTIPLE  1.2  1.3  1.4  1.5  1.9  1.2  1.4  1.5  1.6	AGE 65 ANNUITY 1,813 2,246 2,149 20,403 3,935 4,513 3,962 13,768 -5,507 41,733	FINAL PAY  MULTIPLE  1.1  1.2  1.3  1.2  1.3  1.4  1.7  1.7  1.7	~. )

NOTE: Amortization of increased Prior Service Cost is the same for each formula. \$600,000/year for 30 years.

April 17, 1995

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BC: FUNNYO -0014 X-2056 EVAN Or X-2101 Chris

## **WOOLWORTH CORPORATION**

INTEGRATION LEVEL:	<u>SERVICE</u>	\$22,000	\$22,000	\$22,000	\$22,000	Corrent	
PAY CREDITS:	0 - 10 11 - 20 21+	1.75% /0.75% 2.25 /1.00 3.00 /1.25	2.25 /1.00 2.50 /1.10 2.75		1.80% /0.85% 2.50 /1.10 3.50 /1.40	Plan	
NORMAL COSTS: Ongoing: First Year:		\$7,364,000	\$8,218,000	\$8,855,000	\$7,980,000	9,798,000	
CURREN	T AGE 65 PAY	AGE 65 FINAL PAY ANNUITY MULTIPLE	AGE 65 FINAL PAY ANNUITY MULTIPLE	AGE 65 FINAL PAY ANNUITY MULTIPLE	AGE 65 FINAL PAY ANNUITY MULTIPLE	A O 1	

	CURRENT	<b>AGE 65</b>	<b>AGE 65</b>	FINAL PAY	AGE 65	FINAL PAY	<b>AGE 65</b>	FINAL PAY	AGE 65	FINAL PAY	Age 65
AGE SERVICE	PAY	<u>PAY</u>	<u>ANNUITY</u>	MULTIPLE	ANNUITY	<b>MULTIPLE</b>	ANNUITY	/MULTIPLE/	ANNUITY	<u>MULTIPLE</u>	Annuity
35 / 5 /	20,000	64,868 ° \$ 63,000	<b>6,974</b> √	1.0 🗸	7,740	1.1	8,597 /	1.2	7,813	1.1	16,2836
30 -0	<del>\$-16,000</del> -	<del>\$ 63,00</del> 0	\$ <del>7,243 *</del>	, -1.1	<del>\$ 8,079</del>	<del>1.2</del>	<del>-\$-8,928</del> -	<del>1.3</del>	<del>\$ 8,083</del>	, -1.2 1	
35 / 5 /	50,000 /	162,170 /	´ 19,880 √	61	22,064	1.3	24,700	1.4	22,246	1.3	43,549
37	<del>-24,000-</del>	<del>72,000                                  </del>	<del>-8,126</del>	1-0	<del>78,984</del>	<del>4.1</del> - ,	10,037	1.3	<del>9,149</del>	<del>-1.2</del>	
35 / 5 /	150,000 /	486,5702	62,939 /	1.2	69,855	1.3	78,428	1.5	70,403/	1.3/	134,426
-25	<del>-150,000</del>	, <del>222,</del> 000	/ <del>42,40</del> 4	<del>1.8</del>	<del>-43,572</del>	<del>1.8</del> /	45,285	<del>-1.9-</del> /	<del>-43,935</del>	1.8	8,017
50 / 20 /	20,000	36,019	4207	1.1	4,428	1.1	4,697	1.2	4,513	1.2	
45 20	<del>150,</del> 000	<del>-329,</del> 000	<del>-42,301</del>	, -1.2	45,893	, <del>-1:3</del> /	<del>51,138</del>	1.4	<del>46,9</del> 62	<del>-1.3</del>	
50 20/	50,000/	90,047	/ 12, 893 ¢	1.3	13,558 <b>4</b> 6,382	1.4	14,482	1.5	13,768	1.4	23,028
40 / -5	<del>-150,</del> 000-	400,000	/ <del>41,</del> 964	<del>1.0</del>	46,382	, 1.1	-51,612	, <del>1.2</del> /	<b>-46,507</b>	/ <del>1.1</del> ,	212/
50 20	150,000	270,142	41,957	1.4	44,101	1.5	47.217	1.6	44,733	1.5	73,163

NOTE: Amortization of increased Prior Service Cost is the same for each formula. \$600,000/year for 30 years.

April 17, 1995

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